

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

_____)	CIVIL ACTION
GENERAL CAPITAL PARTNERS, LLC)	FILE NO. 1:07-CV-4089 (kmk/dfe)
)	
Plaintiff,)	NOTICE OF MOTION
)	TO DISMISS
v.)	
)	ECF CASE
LIBERTY RIDGE, LLC (f/k/a AMERICAN)	
HERITAGE COMMUNITY/LIBERTY)	
VILLAGE, LLC))	
)	
Defendant)	
_____)	

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Matthew G. Parisi dated August 23, 2007, the exhibits attached thereto and the accompanying Memorandum of Law, Defendant Liberty Ridge, LLC will move the Court, before the Hon. Kenneth M. Karas on September ____, 2007, at ____ a.m., or as soon thereafter as counsel may be heard, at the United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to 28 U.S.C. § 1406 (a) dismissing this matter or, in the alternative, transferring venue of the claims of Plaintiff General Capital Partners, LLP to the United States District Court for the Western District of Virginia, Lynchburg Division, and for such other and further relief as to the Court seems just and proper.

Respectfully submitted,

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